

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK**

EDWARD R. RHODES & JEAN ANN)	
RHODES,)	
)	Civil Action No.:
Plaintiffs,)	
)	
vs.)	
)	
PHOENIX ARMS,)	
)	
Defendant.)	

DECLARATION OF CHRISTOPHER RENZULLI

I, Christopher Renzulli, declare under penalty of perjury that the following is true and correct:

1. I am a licensed practicing attorney in the State of New York. I have been retained by Defendant, Phoenix Arms, Inc. to defend it in the above-captioned lawsuit.

2. I have been licensed to practice law in New York since 1995. During that time, I have represented parties in numerous personal injury actions filed in New York State courts and the United States District Court for the Northern District of New York. In my practice, I routinely provide to clients my evaluation of the potential monetary value of personal injury claims in New York courts.

3. I have reviewed the allegations and claims made for personal injury damages by the Plaintiffs in their Complaint in this case.

4. My associate, Anthony Odorisi, spoke with counsel for Plaintiffs who informed our firm that Plaintiff Edward R. Rhodes suffered a non-displaced oblique fracture to his left knee as a result of the alleged incident. Further, our office was informed that Plaintiff Edward R. Rhodes underwent surgery after the alleged incident, that bullet fragments remain in his left leg, that he continues to undergo physical therapy, and that he requires the aid of a cane to walk.

5. In my opinion, the monetary value of the Plaintiffs' claims as alleged in Plaintiffs' Complaint, if proven, exceeds \$75,000 in a New York court.

I, Christopher Renzulli, declare under penalty of perjury under the laws of the United States of America, and pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Dated: March 10, 2020.

/s/ Christopher Renzulli
Christopher Renzulli (508828)
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